

## Polek, Jim

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**From:** Pickrel, Jan  
**Sent:** Monday, December 01, 2014 9:06 AM  
**To:** Whitson, Amelia; Polek, Jim  
**Cc:** Pritts, Jesse  
**Subject:** SCWW permitting

Hi Amanda and Jim –

I am getting a lot of questions here [from “above”] to ensure that the Oxnard Green Compass is (was) permitted correctly and if there was any way to prevent the past event from recurring.

A related topic raised is one that has recently been coming up in other Regions and States: the use [or lack of the use] of the combined wastestream formula to account for wastestreams that may be received and treated at the CWT but do not fall within the applicability of the CWT regulations. See 437.1(b).

To this end, I tried to see what the Oxnard facility said they receive, but I found their website somewhat unclear, particularly in light of the frequently stated comment in the press regarding sewage being trucked in for treatment.

Have we done any reviews of the pretreatment permit to see if it is well written?

Have we inspected the CWT?

Thanks!

--Jan

202-564-7904

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<http://www.greencompassenv.com/our-services/waste-disposal/>

Southern California Waste Water (SCWW) Ventura County

Established in 1959, SCWW Ventura County is our flagship treatment facility, conveniently located directly off the CA 126 freeway in Santa Paula, Ventura County. SCWW primarily serves domestic, industrial and petroleum generators throughout Southern California, accepting hundreds of non-hazardous waste streams. A premier feature of SCWW is that it offers 24/7/365 receiving and processing—we can accept our clients’ materials all day, every day.

SCWW demonstrates the highest commitment toward environmental responsibility, proven by our CERCLA status, the only California so recognized by the Environmental Protection Agency (EPA) in 2008. This means SCWW is pre-approved to take non-hazardous materials in case of a statewide disaster.

This facility’s modern treatment systems utilize unpurposed [sic] advanced equipment, including five centrifuges, electrocoagulation, carbon and micron filtration, California’s largest private ozone-injection tank farm,, air filtration systems, as well as chemical treatment.. Our technology, size and service expertise allow SCWW to dispose of your waste in accordance with all state and federal regulations, with a fast turnaround time to keep your business moving.

<http://www.greencompassenv.com/our-services/oilfield-services/>

“Drilling”

Transportation & Disposal Green Compass handles the transportation and disposal of Class II wastes and fluids. We accept the following waste streams at both SCWW and CVWW:

- Cement returns
- Drill cuttings
- Water-based muds

- Oil-based muds

#### “Operations”

Transportation & Disposal Green Compass is prepared to handle, transport and dispose of production-related waste streams, particularly oilfield production water and tank bottoms. SCWW is the only facility from Los Angeles to San Francisco able to take your production water 24/7/365—whether you bring the waste to us or we remove it for you. Green Compass transports and disposes of other waste streams as well, including oily dirt, oilfield debris and filter media. If it’s related to crude oil production, we’re capable of handling it and bringing it to one of our Green Compass-approved disposal facilities. Our trucking fleet includes Vacuum Trucks (160/130/70 BBL), Roll-off Trucks (1 BIN / 2 BIN), Flatbed Trucks, End-Dumps and Water Trucks (4000/2000 GAL).

Lease Services California’s recent bill, AB 1960, mandates that the bottom of oil tank floors must be certified every two to every five years, depending on the size of the tank. This certification involves an integrity test of the tank floor using ultrasound. Failing these tests could mean a halt in your oil production, per the Division of Oil, Gas & Geothermal Resources (DOGGR). To ensure that our clients can work continuously, Green Compass sends in our own crew to pressure wash the tank, pump out the tank bottoms with our vacuum trucks and take it to one of our Green Compass-approved disposal facilities. We also provide mobile water filtration reviews, where we visit your facility, examine your water treatment system and give you an analysis of how it’s all working. Offering this level of comprehensive service not only gives you the peace of mind that your systems are functioning properly, but also reduces your overall costs by improving the economic efficiency of such a review.

<http://www.forkbin.com/> - Map is shown of Ventura and Oxnard